



June 10, 2022

Honorable P. Kevin Castel, U.S.D.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

By Electronic Filing

Re: Rodriguez et al. v. City of New York, et al., 21-cv-10815(PKC)

Your Honor:

I am co-counsel for Plaintiffs in this matter. I hereby submit this joint letter pursuant to the Court's January 7, 2022 Order in addition to the parties' proposed Case Management Plan (CMP) and Proposed Protective Order which were submitted to the Court today in advance of the Initial Pretrial Conference scheduled for June 17, 2022.

By way of background, plaintiffs allege that on or about June 4, 2020 defendants inter alia falsely arrested plaintiffs and subjected them to excessive force while the plaintiffs were participating in protests in Mott Haven, New York. Defendants deny plaintiffs' allegations and submit, without limiting their defenses, that they have not violated any rights, privileges, or immunities under the Constitution or laws of the United States or the State of New York or any political subdivision thereof, nor have defendants violated any acts of Congress providing for the protection of civil rights. Following the completion of discovery in this matter, defendants intend on filing a motion for summary judgement pursuant to Federal Rule of Civil Procedure 56. The parties are open to settlement and are willing to engage in a settlement conference before a magistrate judge after the exchange of responses to interrogatories and document requests. The parties agree on the terms of the submitted CMP and Proposed Protective Order. Finally, the parties are in the process of working on a separate stipulation as it relates to New York City Police Department body worn camera footage.



The parties thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/s/

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/s/

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Senior Counsel